

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

UNITED STATES OF AMERICA, :
Plaintiff, :
vs. : Case No. 1:21CR080
TONI WRIGHT, : Judge McFarland
Defendant. :
:

MOTION TO CONTINUE SENTENCING

Now comes the Defendant, TONI WRIGHT, by and through counsel, and hereby moves the Court to continue the sentencing in this matter for approximately 60 days.

The sentencing is presently set for September 19, 2023. Ms. Wright is scheduled to have another surgery later this month on September 25, 2023. Due to this surgery, the recovery time, and her continuing medical problems, Mr. Wright requests a continuance of the sentencing hearing.

Additionally, the probation department has been provided with approximately 1500 pages of updated medical records related to Ms. Wright's continuing problems. Probation needs additional time to amend the presentence report.

Counsel for Ms. Wright has consulted with Ebun Taiwo, Assistant United States Attorney, and she is in agreement with this motion.

Wherefore, Ms. Wright respectfully requests that the Court continue the sentencing for approximately 60 days.

Respectfully submitted,

DEBORAH WILLIAMS
FEDERAL PUBLIC DEFENDER

s/ Richard Monahan

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Attorney for Defendant, Toni Wright

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served upon Ebun Taiwo, Assistant United States Attorney, on this 12th day of September, 2023.

s/ Richard Monahan
Richard Monahan